

### **Matrix of DEIS Responses**

<b>Municipality/ Entity</b>	<b>Issues w/ DEIS</b>	<b>Mitigation Concerns</b>	<b>Mitigation Funding</b>	<b>Other comments</b>
Aurora	<ul style="list-style-type: none"> <li>• No evaluation of long term alternatives</li> <li>• Does not evaluate cumulative impact of all rail operations in a community</li> <li>• Fails to account for increase in train length when considering freight traffic increases</li> <li>• Fails to accurately assess proximity of trains to property owners</li> <li>• Incorrectly states Aurora has only three at-grade crossings; there are five</li> <li>• Inaccurate traffic counts-off by 357%</li> <li>• Severely underestimates traffic delays</li> <li>• Fails to consider traffic delay impact on adjacent roadways</li> <li>• Traffic projections are evaluated for only three years - should include at least ten</li> <li>• Fails to consider CN's poor safety record in Canada</li> <li>• Fails to thoroughly analyze long-range impacts on existing land uses</li> <li>• Inadequate evaluation of biological resources/natural areas</li> <li>• Unclear methodology for grade separation recommendations</li> <li>• Fails to evaluate train operation curfews on Quality of Life - If imposed roadways would not have the capacity to recover from delays during off peak times</li> <li>• Does not address safety enhancements regarding school, pedestrian or bicycle traffic</li> <li>• Fails to consider impact on STAR line commuter rail times</li> <li>• Inadequate evaluation of impact on school bus, suburban bus and public transportation traffic</li> <li>• Fails to identify the joint jurisdictional Quiet Zone being established by Aurora, Naperville, and Warrenville</li> <li>• Fails to evaluate impact on Rush Copley Hospital emergency service operations</li> </ul>	<ul style="list-style-type: none"> <li>• No funding sources are identified for recommended mitigation and "voluntary" mitigation falls well short of the recommended mitigation.</li> <li>• Aurora urges the STB to mandate necessary improvements and identify funding sources that do not place any additional burden on the communities that would see increases in freight traffic.</li> </ul>	<ul style="list-style-type: none"> <li>• Aurora makes it clear that no immediate funding exists to mitigate the traffic, safety and environmental problems that will result from a significant increase in freight traffic on the EJ&amp;E.</li> </ul>	

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Bartlett	<ul style="list-style-type: none"> <li>• Ignores data adverse to CN's position</li> <li>• Manipulates data to suit CN's goals</li> <li>• Ignores accepted traffic engineering principles</li> <li>• traffic impact analysis is flawed and grossly understated specifically:               <ul style="list-style-type: none"> <li>o year 2015 average daily traffic ("ADT") on Stearns Road is significantly underestimated.</li> <li>o the 7-year time horizon for impact evaluation is inconsistent with the State of Illinois and Federal environmental review standard of 20 years. Future highway and train traffic may be significantly underestimated.</li> <li>o fails to apply delay and queuing equations correctly, based on national Highway Capacity Manual ("HCM") practice.</li> <li>o Proposes alternatives for the "Munger Connection" rather than improving current conditions, which could worsen grade crossing blockage</li> <li>o Underestimates highway grade crossing delay and queuing by 50% to 100%.</li> <li>o fails to analyze adverse (extra) routing distances for the Bartlett Fire Protection District Station 3 to serve the population west of the EJ&amp;E Railroad.</li> <li>o estimates of future (20 year) traffic demand for the Stearns Road crossing indicate that the daily train/auto exposure cross-product will exceed the DEIS grade separation criterion of 1,000,000</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• CN fails to define a comprehensive mitigation program for the real impacts resulting from the proposed transaction.</li> <li>• Mitigation for grade separation is avoided and mitigation relating to emergency vehicle response is stated in general terms only.</li> </ul>		

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CMAP (Chicago Metropolitan Agency for Planning)	<ul style="list-style-type: none"> <li>• Five year time horizon of the study is inadequate with regard to the capacity constraint analysis, and the impacts on freight and passenger rail service</li> <li>• The EIS process was not designed to accommodate the regional viewpoint</li> <li>• Does not provide the information necessary for thorough decision making by an agency such as ours to reach an informed decision as to what constitutes the region's "greater good"</li> <li>• A thorough cost-benefit analysis of the transaction is needed</li> <li>• Assertions about EJ&amp;E traffic and should be reconciled with the commonly held projections regarding the future of rail traffic</li> <li>• DEIS incorrectly concludes that the acquisition would have no adverse impact on existing Amtrak, STAR line or Metra service</li> </ul>	<ul style="list-style-type: none"> <li>• CN's mitigation commitments should address real concerns about safety, noise, vibration, and traffic congestion, along with the quality of air, water, and other natural resources</li> <li>• Out of the 112 total at-grade crossings, the DEIS lists 15 highway/rail at-grade crossing that require mitigation, but does not specify any mitigation measures</li> </ul>	<ul style="list-style-type: none"> <li>• Increases in the total rail traffic above that outlined in the Operating Plan shall be analyzed in terms of the impact on communities, other rail operations and at-grade crossings of the highway network and CN shall participate in appropriate mitigation measures</li> <li>• CN shall agree that increases in the total rail traffic operating above that outlined in the Operating Plan shall be consistent with commuter rail operations, including any commuter rail operations identified as the "preferred alternative" in the Southeast Service and STAR Line New Starts processes now under way.</li> <li>• STB will require the CN to commit to a formal mitigation plan.</li> <li>• CN shall place in escrow \$150 million in a traffic impact mitigation fund to implement their share of these improvements. (\$30</li> </ul>	<ul style="list-style-type: none"> <li>• Our region's status as a major international freight hub is threatened by rail freight congestion</li> <li>• CMAP is a strong advocate of CREATE, which has been adopted as part of the Strategic Regional Freight System in our federally approved 2030 Regional Transportation Plan.</li> <li>• Diverting state, regional, and local resources to facilitate CN control of the EJ&amp;E would not be consistent with the 2030 Regional Transportation Plan for Northeastern Illinois</li> <li>• Assurance of the long-term viability of Amtrak service now using the St. Charles Air Line is necessary, including the connection at Grand Crossing proposed in the</li> </ul>

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CMAP CONTINUED			<p>million for improvements at each SRA/CN intersection with a 50/50 public/CN split). Selection and scope of mitigation projects should be determined through consultation between CN and the appropriate state, local, and regional governmental agencies. These escrowed funds shall be available for 10 years. Funds remaining after 10 years shall be returned to CN.</p> <ul style="list-style-type: none"> <li>• STB will require the CN to cooperate with efforts to develop sidewalk and trail crossings.</li> <li>• We urge the STB to retain authority for ensuring these conditions are achieved if actual volumes exceed CN's plans</li> </ul>	CREATE Program

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Dupage County	<ul style="list-style-type: none"> <li>• It is impossible to adequately assess future impacts on transportation system, safety, and the economy of the region based on the five-year projections provided - a minimum of 10 years is necessary</li> <li>• Incorrectly assumes future number of trains will not increase beyond numbers provided by CN</li> <li>• Jeopardizes the viability of STAR line service</li> <li>• Ignores that EJ&amp;E intersects with heavy Metra commuter operations at four crossings: Barrington, Spaulding, West Chicago, and Joliet-Rock Island Tower.</li> <li>• Fails to consider the CREATE program as feasible alternative</li> <li>• Fails to analyze property value losses and the cumulative financial impacts of such losses</li> <li>• Capacity on EJ&amp;E will be reached by 2015 yet forecasts by the USDOT's Federal Highway Administration (FHWA) indicate rail shipments will increase 85% by 2035</li> <li>• Does not provide a timeline for when freight train traffic will increase and when mitigation projects will be implemented</li> <li>• Underestimates highway/rail at-grade crossing gate down times resulting from significant increases in number/length of trains on the EJ&amp;E</li> <li>• Fails to analyze the cumulative effects of fuel consumption and greenhouse gas emissions</li> </ul>	<ul style="list-style-type: none"> <li>• Fails to conduct a thorough cost-benefit analysis and only then can mitigation be evaluated</li> <li>• Fails to identify specific mitigation measures and to put in place an enforceable mitigation plan to ensure CN is held accountable for providing a fair share of the funding.</li> <li>• Fails to identify any available federal, state or local sources that would provide needed funding</li> <li>• Fails to address the adverse impacts on affected communities if the required mitigation projects are not implemented</li> <li>• The Final EIS must mandate that the STAR Line will be allowed to run on the EJ&amp;E tracks, and that commuter rail operations on will have priority over freight trains</li> </ul>	<ul style="list-style-type: none"> <li>• CN should be required to establish and fund a CN/EJ&amp;E Mitigation Projects Fund with at least 50% of the estimated total costs of anticipated projects.</li> <li>• Total cost of projected grade separation projects in Du Page County is \$687.5 million.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

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Griffith	<ul style="list-style-type: none"> <li>• Rejects alternatives such as CREATE without consideration</li> <li>• Fails to recognize safety hazards at numerous rail crossings</li> <li>• Incomplete methodology for assessing emergency response impact</li> <li>• Fails to provide analysis of student safety issues</li> <li>• Fails to adequately address hazardous material issues especially given CN's past safety record</li> <li>• Methodologies for calculating noise and vibration levels are outdated and unsubstantiated data is cited</li> <li>• Fails to assess impact on planned expansion of Northern Indiana commuter rail service</li> </ul>	<ul style="list-style-type: none"> <li>• Scope of safety analysis needs to include crossings at Glen Park Ave., Lake, Miller and Elm Streets and 40th Place</li> <li>• Vibration mitigation devices and sound barriers need to be installed</li> <li>• Establishment of quiet zone through entire town is necessary</li> <li>• Griffith requires assurances that all air quality standards are met at CN's expense</li> </ul>	<ul style="list-style-type: none"> <li>• Overpass at Broad Street - \$19 million, not including relocation/ rebuilding of affected businesses and changes in plan for beautification of downtown area</li> <li>• Overpass on Main Street - \$12 million</li> </ul>	<ul style="list-style-type: none"> <li>• 4 schools w/in 1/4 mile of tracks</li> <li>• There are 7 at grade crossings</li> <li>• \$7 million road construction project set to begin in early 2009</li> </ul>

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Hawthorn Woods	<ul style="list-style-type: none"> <li>• Fails to adequately address impacts regarding increased noise levels, transportation of hazardous materials, traffic delays, safety risks, emergency service providers, school districts and property values</li> <li>• Fails to provide assurances relating to commuter rail services particularly the Star line commuter service</li> <li>• Fails to meet established industry standards and practices. (If the acquisition were a regional transit project or a major interstate highway widening, the level of required analysis in these areas would greatly exceed the level of effort included in the DEIS).</li> <li>• Does not provide noise level information at peak rail traffic periods</li> <li>• Fails to report on overall negative impact of noise on property values and quality of life</li> <li>• Lacks structured emergency planning regarding response to anticipated emergencies involving hazardous materials. <b>And, CN has refused to answer specific questions and concerns submitted by our Fire Chief.</b></li> <li>• Rail traffic on the EJ&amp;E is at or near maximum line capacity</li> <li>• Does not comply with traffic engineering practices</li> <li>• Does not address safety concerns relating to local area schools</li> </ul>	<ul style="list-style-type: none"> <li>• Increases in rail traffic (particularly freight trains) and hazardous material transport represents a significant detrimental change for Hawthorn Woods, its citizens and our values and growth assumptions</li> <li>• The changes proposed require more substantial examination and identification of mitigation measures regarding land use, emergency services, school and transportation plans</li> <li>• The EJ&amp;E cuts HW in half and a 10,000 foot train would block both crossings, making it impossible for police responders to get from one side to the other. At any time there are only two police officers on duty and both could be “trapped” on one side by a train.</li> <li>• St. Matthew School is adjacent to the EJ&amp;E and safety concerns such as traffic and derailment need to be addressed.</li> <li>• Fails to address mitigation measures such as restrictions on freight traffic to avoid peak traffic periods or school bus schedules.</li> <li>• Does not address potential mitigation or safety enhancements related to pedestrian and bicycle traffic</li> </ul>		

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ICC	<ul style="list-style-type: none"> <li>• Fails to address impact on railroad employee safety</li> <li>• FRA accident prediction model fails to include contributing factors i.e. train length &amp; frequency, or potential increases in traffic queuing, interconnected traffic signal systems and peak hour effects of increased train traffic</li> <li>• Fails to adequately address handling of hazardous materials</li> <li>• Fails to include factor of proposed second track in calculations on crash predictions and quiet zones</li> <li>• Numerous discrepancies exist in rail grade crossing information</li> </ul>	<ul style="list-style-type: none"> <li>• CN should provide training for railroad employees in handling hazardous materials</li> <li>• Time period for STB monitoring and enforcement of mitigation should be increased to 10 years.</li> <li>• CN should be required to maintain all rail grade crossings to meet or exceed IL state codes.</li> <li>• CN should be required to install and maintain fencing to adjacent parks and schools.</li> <li>• CN should provide Operation Lifesaver programs to schools, communities and organizations</li> </ul>	<ul style="list-style-type: none"> <li>• CN should provide and pay for diagnostic reviews to address safety improvements at pedestrian-rail grade crossings</li> <li>• CN should be required to work with the City of Joliet and ICC relating to mitigation re: Woodruff Road &amp; Washington Street</li> <li>• CN should be required to fund mitigation of grade separation projects <b>at amounts to be determined by the ICC.</b></li> </ul>	<ul style="list-style-type: none"> <li>• Section 3.2.5 regarding Pedestrian/Bicycle Crossing Safety should be amended to account for current ICC guidelines.</li> <li>• CN should be required to submit all proposed crossing safety improvements including crossings, separations and quiet zones to the ICC for approval, pursuant to IL law.</li> </ul>



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Lake Zurich	<ul style="list-style-type: none"> <li>• Analysis shows the EJ&amp;E will be at or near train volume capacity</li> <li>• Rail traffic reductions by CN on the EJ&amp;E arc will provide other carriers with the opportunity to increase their use on these existing lines negating promised volume reductions</li> <li>• Plan for resolving conflicts with Metra service is vague</li> <li>• Train related accident statistics are contradictory</li> <li>• Incorrectly defines the Quiet Zone corridor</li> <li>• Findings relating to transportation of hazardous materials are misleading</li> <li>• The potential for contamination of groundwater in shallow wells is not addressed</li> <li>• Fails to address any potential contamination from surface runoff</li> <li>• Fails to address impact of decrease in property values which will then reduce village revenue in the form of property taxes</li> </ul>	<ul style="list-style-type: none"> <li>• Operating priority should be given to Metra commuter service</li> <li>• CN should take necessary steps to maintain Quiet Zone status</li> <li>• Non-service to the Lake Zurich Industrial park will have a detrimental effect on land use, revenues, jobs and property taxes</li> <li>• Water quality control structures should be installed at all storm water outfalls along the EJ&amp;E</li> </ul>	<ul style="list-style-type: none"> <li>• Estimates of potential Mitigation upgrades - \$59,567,500</li> <li>• Estimates of annual mitigation costs - \$1,010,000</li> </ul>	

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Naperville	<ul style="list-style-type: none"> <li>• Does not comply with NTSB standards for Class I railroads with regard to Hazardous Materials Emergency Response Plan</li> <li>• Level of Service methods do not comply with traffic engineering practices</li> <li>• Does not conform to the 2008 Emergency Response Guide which recommends an evacuation distance for chemicals of at least 1 mile</li> <li>• Does not address time of day restrictions for freight trains to avoid peak hour conflicts with heavy vehicular traffic or school bus schedules</li> <li>• Future rail traffic is drastically underestimated</li> <li>• Vehicle queue length calculations do not account for wait times</li> <li>• Analysis regarding Diehl Road is ambiguous and incomplete</li> <li>• Capacity analysis for signalized intersections is flawed</li> <li>• Land use characterizations are incorrect</li> <li>• There is no analysis as to whether or not grade separated crossings can accommodate at-grade traffic</li> <li>• Methodologies used to project traffic do not conform with federally established transportation policies which require a 20 year planning horizon</li> <li>• Does not guarantee it will allow STAR Line to operate on its rail lines</li> <li>• Lacks a thorough cost-benefit analysis</li> </ul>	<ul style="list-style-type: none"> <li>• Increases in freight traffic will warrant the installation of upgraded 4-quadrant gate systems</li> <li>• Naperville would like assurances that this transaction will not hinder their plans to establish quiet zones</li> </ul>	<ul style="list-style-type: none"> <li>• Grade separation crossing is necessary at Ogden Avenue; CN should pay at least 50% of cost</li> <li>• The development of the STAR line should be preserved and promoted and any additional costs should be borne by CN</li> <li>• Estimated total costs to upgrade grade separated crossings is in excess of \$1.65 billion</li> <li>• IDOT has no funds available to mitigate the impacts of this purchase</li> </ul>	

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Plainfield	<ul style="list-style-type: none"> <li>• Incorrectly states Plainfield's population is 13,038 when in fact it is over 37,000 residents</li> <li>• indicates "Quiet Zones" will not be adversely impacted until 2015 - additional assurance should be provided so QZs will be retained beyond 2015</li> <li>• Fails to recognize the actual traffic delays at Naperville Road, Route 126 and 127th Street crossings</li> <li>• Traffic data used in Transportation System Analysis is outdated and incorrect</li> <li>• Vehicle traffic data, the foundation of SEA's traffic analyses is underestimated</li> <li>• Fails to address and properly analyze the need for grade separated crossings</li> <li>• Fails to include projections for future increased freight rail traffic on the Illinois River line</li> <li>• Minimizes the potential of hazardous materials spills despite the rising number of hazmat incidents on freight lines.</li> <li>• Fails to comply with federal standards for coordinating hazmat emergency response plans with local communities.</li> <li>• Fails to address how the increase in freight traffic will indirectly affect property values, land use and market influences</li> <li>• Underestimates the increase in rail volume</li> </ul>	<ul style="list-style-type: none"> <li>• The study does not properly take into account the new traffic volumes on 143rd Street, nor properly consider it a "major thoroughfare". Recent changes to 143rd should be re-evaluated to qualify it for mitigation.</li> <li>• Relocated Plainfield Fire PD Station No. 1 should be reconsidered for mitigation.</li> <li>• Hazardous materials transportation risks need to be communicated to School District 202 and Fire Prot. District and emergency response plan drafted.</li> <li>• Noise &amp; vibration data not included; mitigation will be determined once it is available.</li> <li>• Current EJ&amp;E line has antiquated circuitry and switching upgrades are necessary.</li> </ul>	<ul style="list-style-type: none"> <li>• Railroad Grade Separation Study conducted for 6 key locations estimates upgrade costs at \$247-\$275 million</li> </ul>	<ul style="list-style-type: none"> <li>• Transaction will result in a minimum increase in rail traffic volume of 300%.</li> <li>• Plainfield currently has 17 crossings of the EJ&amp;E within its borders.</li> <li>• Includes TRAC report outlining 20+ problems with the DEIS</li> </ul>

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RTA	<ul style="list-style-type: none"> <li>• Offers no assessment on the impact of the STAR line operations or infrastructure cost</li> <li>• Analysis demonstrates practical capacity on the EJ&amp;E will be exceeded.</li> </ul>	<ul style="list-style-type: none"> <li>• CN should be required to reach agreements with Metra and ensure commuter rail operations will have priority</li> </ul>	<ul style="list-style-type: none"> <li>• RTA supports the CMAP proposal wherein CN shall commit to a formal enforceable mitigation plan and contribute to a traffic impact mitigation fund to cover their share of costs for a period of 10 years</li> <li>• RTA urges STB to take the strongest possible position in requiring mitigation measures</li> </ul>	<ul style="list-style-type: none"> <li>• STB should maintain oversight and jurisdiction for 10 years to ensure commuter rail operations will have priority</li> <li>• STB should monitor total rail traffic for at least 10 years and consider performance based penalties if CN's operations result in excessive traffic delays</li> </ul>

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Union Pacific	<ul style="list-style-type: none"> <li>• Scope of the proposed grade separation measures, which could cost CN more than \$300 million, is unjustified and without precedent</li> <li>• SEA's proposed grade separations aim to alleviate vehicular traffic congestion that has resulted from rapid population growth and automobile use in the regions surrounding the EJ&amp;E line—not from railroad operations</li> <li>• SEA uses new and untested methodologies to identify crossings requiring grade separation. SEA's crossing selections raise serious questions about the validity of its new methodologies</li> <li>• Contrary to SEA's suggestion that railroad activity has been a major cause of vehicular traffic congestion, railroad activity has had little to do with it - as regional populations have increased, automobile traffic has exploded</li> <li>• Railroads are the most fuel-efficient land-based freight transportation mode, using only about one third the amount of fuel per ton-mile as trucks</li> </ul>	<ul style="list-style-type: none"> <li>• Requiring CN to pay for such large scale improvements imposes an unfair and disproportionate burden and runs contrary to national transportation policy</li> <li>• UP questions whether many proposed grade separations will have any overall impact on traffic flow and average trip times for motorists</li> <li>• Requiring CN to pay for extensive grade separation measures could block needed railroad capacity growth</li> <li>• Requiring CN to make substantial mitigation payments could also set a dangerous precedent in future mergers, acquisitions, or transactions subject to SEA's environmental oversight</li> <li>• Railroads already pay more than their fair share of infrastructure costs</li> </ul>	<ul style="list-style-type: none"> <li>• STB should limit CN's share of construction costs to 5-10%</li> </ul>	

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Warrenville	<ul style="list-style-type: none"> <li>• indicates that CN may add trackage and change operations within their existing right-of-way at any time without STB approval</li> <li>• impossible to evaluate potential environmental and quality of life impacts without knowing CN's future plans related to train traffic</li> <li>• CN's plans to maximize freight track use and their unwillingness to add tracks for Metra's use negates the viability of STAR line service</li> <li>• Train accident projection calculations do not take into consideration future increases in volume</li> <li>• Increased risk of hazardous waste release is incomplete and does not include potential harm to Warrenville's shallow aquifer</li> <li>• Fails to provide actual analysis of potential pedestrian and bicycle accidents; only states that the will increase</li> <li>• Underestimates Average Daily Traffic figures, particularly at Batavia crossing</li> </ul>	<ul style="list-style-type: none"> <li>• Mitigation of severe economic impact on property values must be addressed</li> <li>• Mitigation is necessary regarding safety issues of adjacent schools, homes and parks</li> <li>• Increased levels of noise and vibration as well as changes in air quality need to be analyzed, particularly at Warrenville's Summerlakes Park</li> <li>• Potential structural damage to buildings/residences due to train vibration needs to be determined; Warrenville has experienced two such incidents and repairs were costly.</li> </ul>		

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Wayne	<ul style="list-style-type: none"> <li>• objects to the narrow scope of DEIS and lack of consideration of "public good"</li> <li>• fails to consider merits of viable alternatives such as CREATE</li> <li>• Vehicle data is estimated and unsubstantiated</li> <li>• Lacks documentation to validate traffic volume and growth estimates</li> <li>• At grade loss of service data needs substantiation</li> <li>• Additional analysis of peak hour roadway conditions is needed</li> <li>• Queue length analysis should be performed</li> <li>• Traffic modeling should be analyzed at all at grade crossings</li> <li>• SEA should conduct further examination on effect on police response times</li> <li>• Methodologies for calculating affects on EMTs are flawed</li> <li>• CN should be required to accommodate the planned Metra STAR line service within its Operating Plan</li> <li>• CN's ability to respond to hazardous materials accidents is undocumented</li> <li>• Fails to include Safety Integration Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Training should be required to be offered by CN at convenient locations throughout the region at least twice in the first 3 years</li> <li>• CN should be required to notify Emergency Services of trains traveling at reduced speeds resulting in increased crossing delay conditions</li> <li>• Provide for training for dispatching personnel to interpret the train location monitors.</li> <li>• Community Liaison position should remain active until at least 2 years after proposed operating levels are reached</li> <li>• CN should fund Operation Lifesaver for 3 years following full implementation of the proposed Operating Plan</li> <li>• CN should establish toll-free hotline for receiving noise and vibration complaints</li> </ul>	<ul style="list-style-type: none"> <li>• Grade separations should be pursued and construction funded by the CN at a level of not less than 70%.</li> <li>• CN should fund detailed traffic studies to determine at grade improvements and be responsible for at least 85% of improvement costs</li> <li>• CN should contribute a minimum of \$30 million for the establishment of an Impact Mitigation Fund, for use at the discretion of the Chicagoland region for improvements that mitigate rail impacts related to this transaction</li> </ul>	

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Will County	<ul style="list-style-type: none"> <li>• Alternatives Analysis is incomplete as not all options to avoid or minimize impacts were considered</li> <li>• it is foreseeable and reasonable to predict that Chicago metropolitan train lines will <b>not</b> experience the promised reduction in their rail traffic since a portion of the excess capacity will be taken by other carriers</li> <li>• Quiet Zone analysis uses 2015 vehicular traffic volumes rather than available 2030 projections</li> <li>• there is no discussion of increased safety risks at crossings where double tracking is proposed</li> <li>• using 2015 traffic projections for railroad operations does not conform with the Class I Railroads guidelines</li> <li>• ADT to DHV (Design Hourly Volume) conversion calculations are inaccurate and inadequate</li> <li>• The train impedance described in the DEIS is underestimated.</li> <li>• Growth rate projection of 3% for Will County is too low</li> <li>• Additional analysis of hazardous materials shipments is necessary</li> <li>• Analysis of hazardous materials shipments in Will County does not evaluate populations in these areas with the greatest impact but rather uses those from Leithon to Gary, Indiana</li> <li>• Land use analysis is narrowly focused and does not include development trends or local character</li> <li>• Environmental justice (EJ) criteria for Will County of 46.4% minority could not be derived using the calculation methods described and EJ analysis is incomplete</li> <li>• Air quality analysis uses 2015 rather than 2030 vehicular traffic volumes.</li> <li>• Analysis of carcinogenic pollutants needs to be re-evaluated</li> <li>• Statement that receptor maximum values represent a “negligible” risk is inaccurate</li> </ul>	<ul style="list-style-type: none"> <li>• There is virtually no spare capacity at the Des Plaines River lift span or East Joliet Yard available to recover from unforeseen circumstances should they arise</li> <li>• The increase in train traffic will increase the risk level for crossing and consequently increase the cost of upgrading crossings to meet Quiet Zone requirements. These incremental costs should be considered</li> <li>• The DEIS recognizes that IL 59 is affected by the IL 126/Main Street crossing; however, mitigation recommendations are not provided</li> <li>• The SEA estimates the economic benefit to CN to be \$14.86 million per year. The costs to Will County communities; however, are not quantified in any measure including <ul style="list-style-type: none"> <li>a) increased cost of delay for travelers (estimated at \$3.2 million per year)</li> <li>b) Increased cost for expanded emergency services</li> <li>c) The “minor localized” property value effects</li> <li>d) Costs of grade separations to maintain community cohesion</li> </ul> </li> <li>• Mitigation to offset delays in emergency response time is lacking</li> <li>• Mitigation is required to build</li> </ul>	<ul style="list-style-type: none"> <li>• Estimated costs for upgrades at 38 specific road locations - 319,464,496</li> </ul>	<ul style="list-style-type: none"> <li>• The current population of Will County is 673,586 residents and is expected to grow to 1,076,446 by the year 2030 - a 60% increase.</li> </ul>



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Will County CONTINUED	<ul style="list-style-type: none"> <li>• Opportunities to reduce potential noise effect section needs clarification</li> <li>• Information regarding noise abatement goal is conflicting</li> <li>• Fails to address impact of vibration levels cited in FTA impact assessment</li> <li>• Biological resource impact analysis is incomplete; the level of detailed information needed to properly assess impacts has not been provided</li> <li>• Analysis of wetland impacts presented is insufficient</li> <li>• Duplicating fire stations to serve existing or future areas adversely affected (with delay times over 30 seconds) would be a community impact and cost not disclosed</li> </ul>	additional fire stations to serve existing or future areas adversely affected		